



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EAG/JDG/CMP  
F.#2008R00530

271 Cadman Plaza East  
Brooklyn, New York 11201

August 7, 2012

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Thomas Gioeli, et al.  
Criminal Docket No. 08-240 (S-6) (BMC)

Dear Judge Cogan:

The government respectfully submits this letter requesting an additional extension of the post-trial briefing schedule ordered by the Court on June 7, 2012. With the consent of defense counsel, we respectfully request a second extension of the government's time to respond to the defendants' Motions for Acquittal and New Trial (ECF Docket Nos. 1606 and 1607), from August 10, 2012 to August 17, 2012. The government has consented to the defendants' request for a similar extension of their time to reply, from September 5, 2012 to September 19, 2012.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Elizabeth A. Geddes  
James D. Gatta  
Cristina M. Posa  
Assistant U.S. Attorneys

cc: Adam D. Perlmutter, Esq. (by ECF)  
Carl Herman, Esq. (by ECF)  
Samuel M. Braverman, Esq. (by ECF)  
Louis V. Fasulo, Esq. (by ECF)